

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAN'T STOP PRODUCTIONS, INC.,

Plaintiff,

7:17-cv-06513-CS

-against-

**DECLARATION OF  
KAREN L. WILLIS**

SIXUVUS, LTD., ERIC ANZALONE,  
ALEXANDER BRILEY, FELIPE ROSE, JAMES  
F. NEWMAN, RAYMOND SIMPSON, and  
WILLIAM WHITEFIELD,  
Defendants,

KAREN L. WILLIS dba HARLEM WEST  
ENTERTAINMENT

Intervenor,

-against

SIXUVUS, LTD., ERIC ANZALONE,  
ALEXANDER BRILEY, FELIPE ROSE, JAMES  
F. NEWMAN, RAYMOND SIMPSON,  
WILLIAM WHITEFIELD  
Defendants

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Pursuant to 28 U.S.C. 1746, KAREN L. WILLIS, under penalty of perjury, swears to the  
truth of the following statements for which I can competently testify:


1. I am the Intervenor in the above and titled case.
2. I am the exclusive licensee (in my personal capacity) for the staging of Village People live performances worldwide.
3. All itemized bills and statements submitted in support of my motion for recovery from TRO bond are true and correct copies of the bills received by me.

4. That I lost over \$100,000 in bookings during the period of time of the TRO which prevented me from being the exclusive licensee for Village People live performance, and instead split Village People live performances with the Sixxvus therein diluting the brand.

5. That I spent a minimum of \$1,200 on airfare complying with the TRO and that's on the low end.

San Diego, California

Dated: September 9, 2019

A handwritten signature in black ink, appearing to read 'K. Willis', written over a horizontal line.

KAREN L. WILLIS